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Prepared at Request of Legal Counsel

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US Environmental Protection Agency
Region 5
2525 North Shadeland Avenue
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Attention: Ms. Shelly Lam

Reference: West Vermont Street Drinking Water Site
Speedway, Indiana; Site ID#B5UJ
Project No. 533.42.08

Dear Ms. Lam:

We write on behalf of Allison Transmission, Inc. (ATI) in connection with the West Vermont Street Drinking Water Site (the Site) and in response to ENVIRON's June 30, 2011 letters to Genuine Parts Company, which we understand have been submitted to USEPA. ENVIRON is critical of the work that has been performed on behalf of General Motors (GM) under its RCRA Corrective Action Agreement with USEPA, generally claiming that some Areas of Interest (AOIs) at the Allison Transmission, Inc, Facility (ATI Facility) have not been sufficiently delineated.

Respectfully, ENVIRON's papers are red-herrings. Whether or not the AOIs at the ATI Facility have been sufficiently delineated is irrelevant to whether contamination at the ATI Facility contributed to the contamination at the Site. As we discuss in our July 8, 2011 submission to EPA, the sampling performed by Arcadis in June 2011 conclusively demonstrates that the known perchloroethylene and vinyl chloride groundwater contamination at the Site is not present between the Site and the ATI Facility. The evidence establishes that such AOIs specifically (and the ATI Facility generally) are not contributing, and have not contributed, to conditions at the Site. While such AOIs are not related to the Site, we note that according to Arcadis the AOIs at the ATI Facility have been fully delineated vertically and horizontally and have been or are being remediated entirely on the ATI Facility.

During the June 16, 2011 meeting regarding the Site, USEPA Region 5 invited all participants to submit comments regarding the March 27, 2011 Weston Solutions (Weston) *Technical Memorandum Analytical and Hydrogeological Evaluation* (TM) and other data associated with the Site. ENVIRON commented on the TM and the June 16, 2011 meeting materials presented by The Payne Firm, Inc. (Payne Firm) in separate correspondence, both dated June 30, 2011. This letter provides comments on the ENVIRON correspondence, which provides no information or support for the proposition that the ATI Facility has a nexus to the Site.

DISCUSSION

For brevity sake, we address only ENVIRON's most significant, and oftentimes contradictory, assertions.

- ENVIRON criticizes Weston's interpretation of the hydrostratigraphy near the ATI Facility as "oversimplified" and based on very little data east of Holt Road. Arcadis, as part of General Motors RCRA Corrective Action and related to the Site, has collected hydrostratigraphic data on the ATI property and between the ATI Facility and the Site from the surface to over 100 feet in order to fully understand the complexity of the stratigraphy. Groundwater monitoring and sampling has been conducted by Arcadis and data collected over all of the potential groundwater zones identified in the alluvium. Similar data relative to the Genuine Parts Site (GPS), the Michigan Meadows Apartment Site (MMAS), and the Michigan Plaza Site (MPS) is not available. ENVIRON further describes the hydrostratigraphic conditions east of Holt Road as much less complex than the "oversimplified" Weston presentation near the ATI Facility, even though the stratigraphic understanding east of Holt Road commonly lacks information from depths greater than 50 feet, which is where much of the understood complexity near the ATI Facility is found. Having access to and knowledge of the Arcadis data and, the lack of appropriate similar stratigraphic and analytical information at deeper depths at the MMAS and MPS, where GPS groundwater contamination is known to have migrated, make it apparent that ENVIRON's criticisms and statements regarding complexity of the hydrosratigraphy east of Holt Road are unsupported. Sufficient deep investigation west of Holt Road by Arcadis has allowed for the understanding of the hydrostratigraphy and demonstrated that the ATI Facility is not the source of contamination to the Site.

- ENVIRON indicates that the hydrostratigraphic complexity west of Holt Road represents a need for even further investigation by Arcadis. ENVIRON appears to ignore the analytical data generated by Arcadis from 2009, 2010, and as recently as June 2011 from the area between the ATI Facility and the Site which has demonstrated that the known perchloroethylene and vinyl chloride groundwater contamination at the Site is not present between the Site and the ATI Facility. These data include Geoprobe screening data and monitoring well data from shallow, intermediate, and deep saturated zones. Vinyl chloride and/or perchloroethylene contaminated groundwater has not been detected in this area in multiple saturated intervals covering depths that represent more than the combined screen interval of the wells at the Site. With respect to ATI, those data are proof that the ATI Facility is not a source of contamination at the Site. Remarkably, ENVIRON does not acknowledge a need for deeper investigation along and east of Holt Road, which is a continuing data gap recognized in the TM (which is relevant to the question of GPS and/or MPS responsibility for impacts at the Site).

- ENVIRON continues to emphasize the general regional groundwater flow direction as a rationale for the GPS to not be a source of contamination at the Site. This recurring argument is not supported by the data, and does not address the site-specific influences on flow that can cause local variations from regional flow that

affect contaminant migration. For instance, at the MPS, January 2011 vinyl chloride results provided by Mundell for shallow monitoring wells in the vicinity of Source Area B do not show elevated concentrations to the southeast (i.e., ENVIRON's general regional flow direction) at MMW-P-05 (<2.0 ug/l), but do show highly-elevated concentrations to the south at MMW-P-06 (15,000 ug/l) and MMW-P-01 (11,100 ug/l). There is no monitoring well coverage to the southwest toward the Site. This lack of western coverage at the MMAS and MPS is a repeated data gap (which, again, is relevant to issue of MPS and/or GPS responsibility for impacts at the Site). Relying on the regional ground-water flow generalization is simply not accurate. The local influences that must be taken into account include: 1) directional changes in the course of Big Eagle Creek; 2) directional changes in the course of Little Eagle Creek; 3) the gaining nature of Big Eagle Creek (i.e., in this case providing potential hydraulic influence away from the Site); 4) the losing nature of Little Eagle Creek (i.e., in this case providing potential hydraulic influence toward the Site); 5) residential pumping at the Site; and 6) site-specific hydrostratigraphy. What the data do tell us, however, is that no contamination originating at or from the ATI Facility has impacted the Site. The data show a clear (and clean) break between the ATI Facility and the Site. The ATI Facility is not a source, and ENVIRON's arguments regarding groundwater flow do nothing to alter that conclusion.

- ENVIRON criticizes the Payne Firm's Figure 1, an overlay of Weston's Figure 15B and 15C, as "an improbable shaped VC plume that would require opposing groundwater flow directions to be present within the plume." However, the Payne figure is not based on and does not present groundwater flow. The figure is based on analytical data which indicate a preferential pathway to the Site from MMAS and MPS. The concern about dense non-aqueous phase liquid (DNAPL) at the MPS raised by ENVIRON and the Indiana Department of Environmental Management (IDEM) is one obvious explanation for contaminant migration from MMAS and MPS to the Site that does not require opposing groundwater flow directions. As cited by ENVIRON, IDEM recognizes with reference to the MPS 1) that the presence of DNAPL is possible given that the lower portion of the aquifer has not been adequately monitored in the source areas and the depth to basal till has not been confirmed, and 2) that DNAPL could be moving at some angle to the groundwater flow. See IDEM's June 22, 2011 letter to AIMCO. Again, however, this issue goes to where responsibility lies for Site contamination as between GPS and MPS. As discussed above, groundwater data demonstrate that ATI has no nexus to contamination at the Site.

- ENVIRON criticizes Weston for drawing conclusions regarding the GPS as a source of groundwater contamination to the Site because of the substantial data gaps Weston identified in the TM; however, ENVIRON attempts to demonstrate the GPS is not a source despite these same data gaps, without an effort to fill any of them, despite conducting a recent investigation near the Site. ENVIRON's investigation is not deep enough and does not extend far enough to the south and west. Nonetheless, the boring logs for the most recent investigation at MW-170S and MW-170D suggest elevation differences on the top of the till layer at which they stopped, which may be useful in determining contaminant migration relevant to the issue of MPS and/or GPS

responsibility for impacts at the Site. It bears emphasizing again that Arcadis' investigations, including its June 2011 deep investigation west of Holt Road, have demonstrated that the ATI Facility is not a source of contamination to the Site; the data gaps relating to GPS, MMAS, and MPS are not germane to ATI. The data prove that the vinyl chloride contamination at the Site is from MPS and/or GPS. The focus should be on whether one or both those sites are the source of contamination at the Site, not on ATI.

CONCLUSION

For the reasons set forth above and in our July 8, 2011 correspondence, the evidence demonstrates that the ATI Facility is not a source of groundwater contamination identified at the Site and that ATI is not a PRP at the Site. The evidence establishes that the source originates at the MPS and/or GPS facilities, although data gaps exist as to the exact nature of the two identified sources and the roles they play in the migration of the commingled MPS and GPS groundwater contamination plumes. ENVIRON's submissions are obviously designed to raise questions about ATI's potential nexus at the Site, notwithstanding the existence of data clearly showing that ATI has no such nexus. In all events, ENVIRON's submissions actually reinforce the conclusion that (i) ATI has no nexus to the Site, and (ii) any remaining data gaps relate solely to the question of MPS' and/or GPS' responsibility for groundwater impacts at the Site.

Sincerely,

The Payne Firm, Inc.

John G. Houser, L.P.G.	Michael L. Woodruff, L.P.G.	John L. Payne, P.E.
Senior Project Manager	Senior Consultant	Principal

cc: Tom Nash - USEPA
Don Heller - USEPA
Erin Brittain - IDEM
Pam Thevenow - Marion County

References:

Arcadis

Allison Transmission RCRA Facility Investigation, prepared on behalf of General Motors, by Arcadis, dated February 20, 2009

Stage II Additional Sampling Data Reports, prepared on behalf of General Motors, by Arcadis dated March 26, 2009

Stage III Additional Sampling Data Reports, prepared on behalf of General Motors, by Arcadis, dated June 19, 2009

Supplement Number 2 to RCRA Facility Investigation: Vermont Street Investigation Data Report, prepared on behalf of General Motors, by Arcadis, dated May 2010

ENVIRON

Push Probe Investigation near MW-170D, letter to Indiana Department of Environmental Management prepared on behalf of the Genuine Parts Company by ENVIRON, dated June 2, 2011

Allison Transmission Submittal, letter providing comments on the Payne Firm presentation materials for the June 16, 2011 meeting with USEPA to Bob Lewis of the Genuine Parts Company, by ENVIRON, dated June 30, 2011

USEPA Technical Memorandum, letter providing comments on the Weston Technical Memorandum for USEPA to Bob Lewis of the Genuine Parts Company, by ENVIRON, dated June 30, 2011

Mundell

Technical Response to the General Notice of Potential Liability Letter West Vermont Drinking Water Site, prepared on behalf of Michigan Plaza (Aimco Michigan Meadows Holdings, LLC ("AMMH")) by Mundell and Associates, Inc., dated May 9, 2011

Payne Firm

West Vermont Street Drinking Water Site, letter to USEPA providing comments on the Weston Technical Memorandum for USEPA, prepared by the Payne Firm, dated July8, 2011

Weston

Technical Memorandum Analytical and Hydrogeological Evaluation, report prepared on the behalf of the USEPA by Weston Solutions dated, March 27, 2011